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FEMP ASBESTOS ABATEMENT PLANTS (TO BE INSERTED IN SECTION III, STEP 8 OF THE RA #26 COMPENDIUM)

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ATTACHMENT

ATTACHMENT IV

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ATTACHMENT TO WEMCO:EM:92-214

FEMP ASBESTOS ABATEMENT PLANS

Background

An Asbestos Site Survey for the FEMP was completed in February of 1992. This Survey identified and assessed the condition of all ACM, and established the abatement procedures to be used on a priority basis. A "Facility Owner's Report" has been sent to each Facility Owner, which provides the above information as well as CAD diagrams showing the physical location of the asbestos-containing material (ACM).

Several years ago, it was noticed that a considerable amount of asbestos fibers had accumulated in the gutter debris of buildings that were clad with transite roof panels. For this reason, a Transite Fiber Migration Study was performed. This Study indicated that asbestos fibers are washing from the transite roofing panels into the storm water system, and that the soil and concrete samples adjacent to transite clad buildings show a high amount of asbestos fibers as compared with control samples.

Short Term Plans (< 5 years)

The short term plans involve the prompt abatement of ACM on the site that has been identified as having the potential for exposures to site workers involved in remedial investigations at the site. This asbestos material has been classified as a potential employee protection concern more than an environmental risk, and targeted for immediate removal or other abatement.

Specifically, the ACM identified during the Site Survey has been assessed per the protocol of the Asbestos Hazard Emergency Response Act, and categorized into Hazard Ranks of 1 through 7 (where 7 represents the most hazardous condition). **Any ACM in a 4, 5, 6, or 7 ranking shall be encapsulated, encased, repaired, or removed.** Asbestos Work Orders have been written for those jobs that can be scheduled by Maintenance, and these are currently being abated by the FEMP Asbestos Team. Any jobs that cannot be done by the Asbestos Team are abated per the "Large Scale Abatement" procedures, as described in the next section.

All facilities are inspected at least annually, to ensure that the condition of the ACM has not changed. If ACM has become damaged, or for whatever reason has been re-assessed into categories 4 through 7, the ACM shall be abated.

The above simply means that some ACM that is in poor condition will be removed soon, and an undetermined - but probably small amount of ACM will be removed in the near future as its condition degrades for whatever reason. All of this will be done within the current Asbestos Management Program, specifically per the Asbestos Operations & Maintenance Work Practices Manual (OM-0005) and Control of Work Involving Asbestos document.

Large Scale Abatements Involving Health & Safety Concerns

Upon completion of the Asbestos Site Survey, there were some critical areas of the site identified as health and/or safety concerns (hazard ranking of 7) which involved quantities of asbestos too large to be designated as small scale, short duration abatements. Most of these projects focus on deteriorating transite that pose an unacceptable safety risk, and for that reason have been targeted for immediate abatement as part of the ongoing Environmental Management Asbestos Program. In addition to the Site Survey, Asbestos Consultants have examined each of these areas to confirm the seriousness of the hazard and recommend the appropriate abatement action (encasement, encapsulation, removal, repair). These projects have been reviewed and prioritized, and abatement will be done in accordance with CERCLA RI/FS concerns.

Renovations

Some asbestos will be removed as a result of renovation projects that do not necessarily involve hazardous ACM such as the recent lab renovation. These removals shall be budgeted and managed as part of the overall facility renovation, with technical program oversight provided by Asbestos Program personnel. Any such work will be done by personnel that are certified to remove asbestos in the State of Ohio.

Long Term Plans (> 5 years)

The long terms plans for the asbestos abatement focus on the ACM which is not targeted as an immediate short term health and safety hazard, but poses environmental (and worker protection) hazards during facility demolitions, and environmental weathering (transite) that occur while the FEMP is remediated. As communicated to the USEPA in the Asbestos Abatement Removal Action #26 Compendium, the current long term plans reflect information from the Asbestos Site Survey, Transite Fiber Migration Study, and the Safe Shutdown Work Plan (Removal Action #12). These long term plans will continue to evolve as other supporting documentation*, in particular the "Study for Systematic Removal of Buildings and Facilities" (due to USEPA 1/15/93) is compiled. For now, the plans generally describe how the FEMP shall address abatements involving demolitions and deteriorating transite. All major abatements will be addressed by OU3 Removal Actions.

Safe Shutdown

It is anticipated that very little abatement of ACM will occur as a part of the Safe Shutdown Program. Any abatement required will be addressed per the Work procedures within the Safe Shutdown Program (Removal Action #12 Work Plan), with technical program oversight provided by personnel from the Asbestos Management Program.

Demolitions

As facilities are scheduled for demolition, any ACM removal will be addressed as part of the Removal Action Work Plan (e.g. Plant 7 Dismantling).

The actual plan for demolition of onsite facilities will be published as a part of the "Study for Systematic Removal of Buildings and Facilities", which is due to the EPA on 1/15/93. When this Study is issued, the ACM removal for each facility can be prioritized using the information from the Asbestos Site Survey.

Transite

The Asbestos Site Survey identified only five large scale abatement projects that required immediate abatement due to deteriorating transite, but many more of the 56 buildings were observed to contain transite in various degrees of decomposition.

Based on these Survey results, the Transite Fiber Migration Study, and the inevitable weathering of untreated FEMP transite, a Transite Fiber Stabilization Study is now in progress to determine the best, general method for stabilizing deteriorating transite. The recommendations of this Study (due in October of 1992) will:

1. Present alternatives as to how to treat the transite surfaces.

2. Be tied to the Building Removal Study mentioned above, in that the treatment of transite surfaces may differ depending on whether the building will be demolished in two years, twenty years, or may remain indefinitely. This Study and the Building Removal Study will be used to prepare the details of transite abatement, which will be submitted within one month of the completion of the Building Removal Study.

3. Conform with the implementation of OU3 Response Actions.

Summary

Some key points that should be highlighted:

* ACM at the FEMP has been identified, assessed, and prioritized for abatement.

* An active program is in place to abate the most serious problems in the short term, and provide technical program oversight in the long term remediation involving non-critical ACM.

* All facilities are re-inspected annually to ensure current plans reflect the most accurate assessment of ACM hazards.

* The "Study for Systematic Removal of Buildings and Facilities" and the OU3 RI/FS will determine the (demolition) ACM removal priorities.

* The Transite Fiber Migration Stabilization Study will determine the manner in which transite panels are treated.

Supporting Documentation

A. Study for Systematic Removal of Buildings and Facilities

Identifies buildings and facilities no longer needed and provides guidance for future demolitions and renovations. Due to the USEPA on 1/15/93.

B. Work Plan for Plant 7 Dismantling

Due to the USEPA on 4/20/93.

C. Safe Shutdown Work Plan

Submitted to the USEPA on 10/31/91 in fulfillment of Consent Agreement Removal Action #9; revised and resubmitted to the USEPA in June of 1992.

D. Asbestos Site Survey

Completed on 2/28/92. Available upon request.

E. OU3 RI/FS Work Plan Addendum

Submitted to USEPA on 5/29/92.

F. OU3 Remedial Investigation Report

Due to the USEPA on 6/11/96.

G. OU3 Feasibility Study Report

Due to the USEPA on 11/5/96.

H. Transite Fiber Stabilization Study

Due to be completed 10/92.